

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

**PROVIDENCE HEALTH &
SERVICES-OREGON**, an Oregon
nonprofit corporation, dba Providence
Portland Medical Center,

Plaintiff,

vs.

SANJANA PAHALAD MANCUSO,
personal representative of the Estate of
Rattan Kumar Pahalad, in her official and
personal capacities,

Defendant.

Case No. 16CV38474

**QUALIFIED PROTECTIVE
ORDER**

This order authorizes any “covered entity,” as that term is defined in 45 C.F.R. § 160.103, who is provided with a subpoena issued by one the parties to this action requesting the production of documents or commanding attendance at deposition or trial to disclose relevant protected health information relating to patient Rattan Kumar Pahalad in response to such request or subpoena. This order is intended to authorize such disclosures under the privacy regulations issued pursuant to HIPAA. 45 C.F.R. § 164.512 (e)(1)(i).

The parties are expressly prohibited from using or disclosing the protected health information obtained pursuant to this order for any purpose other than this action, except Defendant shall be entitled to use the protected health information for any purpose not otherwise unlawful. Nothing herein shall be construed to impair or limit the rights of Plaintiff, as a covered entity, to use, disclose, access, or maintain protected health

1 information obtained by Plaintiff independent of this matter in any manner consistent
2 with applicable state and federal laws governing protected health information.
3

Signed: 3/1/2017 11:51 AM



Circuit Court Judge Eric J. Bloch

4
5
6
7
8 STIPULATED BY:

9 HARRANG LONG GARY RUDNICK P.C.
10 Arden J. Olson, OSB 870704
11 arden.j.olson@harrang.com
12 Lorelei Craig, OSB 152515
13 lorelei.craig@harrang.com

14 Of Attorneys for Plaintiff

15 THATCHER SMITH LAW
16 Maret Thatcher Smith, OSB 105103
17 maret@thatchersmithlaw.com

18 FISHERBROYLES
19 Kris Alderman, Pro Hac Vice

20 Of Attorneys for Defendant Mancuso
21
22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF COMPLIANCE AND READINESS
PURSUANT TO UTCR 5.100

This proposed **QUALIFIED PROTECTIVE ORDER** is ready for judicial signature because:

- ☒ Each opposing party affected by this order or judgment has approved the order or judgment, as shown by signature on the document being submitted or by written confirmation of approval sent to me.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I certify that on February 14, 2017, I served or caused to be served a true and complete copy of the foregoing QUALIFIED PROTECTIVE ORDER on the party or parties listed below as follows:

- ☐ Via the Court’s Efiling System
- ☐ Via First Class Mail, Postage Prepaid
- ☒ Via Email
- ☐ Via Personal Delivery

Maret Thatcher Smith Thatcher Smith Law 107 SE Washington St. Ste 255 Portland, OR 97214 maret@thatchersmithlaw.com	Kris Alderman FisherBroyles 945 East Paces Ferry Road Suite 2000 Atlanta, GA 30326 kris.alderman@fisherbroyles.com
Of Attorneys for Defendant Mancuso	Of Attorneys for Defendant Mancuso

HARRANG LONG GARY RUDNICK P.C.

By: s/Arden J. Olson
Arden J. Olson, OSB #870704
Telephone: 541-485-0220
Facsimile: 541-686-6564
Of Attorneys for Plaintiff